

## Lehman Law Group

June 11, 2018

Honorable Ann M. Donnelly  
United States District Court Judge  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

**Re: Request for a one-week extension in *Bonikos et al v. Foodoni NY 23 Corp. et al*, 17 Civ. 02162 (RLM)**

Your Honor:

I am counsel for the Defendants in the above-captioned case. Defendants retained this firm, Lehman LG LLC, and I filed my notice of appearance eight days ago (Dkt. #33). The combined Joint Pretrial is due on June 15, 2018.

I request a one-week extension of time to file the Joint Pretrial so that it is due on June 22, 2018. This request is Defendants' **first** request for an extension in this case. In addition, Plaintiff's counsel has consented to the extension.

The extension will allow the lawyers in the case to become familiar with the case file, which was only recently transferred to them. In addition, Brian Lehman, counsel to the firm, has sent an expedited request for a certificate of good standing to the state of Connecticut and intends to file a *pro hac vice* motion as soon as it is received. The extension will help him appear and participate fully.

Finally, I note that Plaintiff's counsel, Salim Katlach, and I, along with Mr. Lehman, intend to engage in settlement discussions in the next two weeks. The additional time will allow us to have this discussion and we hope resolve the underlying litigation without the expenditure of additional resources by the parties and the Court.

The parties jointly appreciate the Court's time and attention to this request.

Sincerely,

/s/ T. Bryce Jones, Esq.  
T. Bryce Jones, Esq.  
Lehman LG LLC

Cc: all counsel by CM/ECF